

REED SMITH LLP
A limited liability partnership formed in the State of Delaware

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Attorneys for Defendant Wells Fargo Bank, N.A.
(for itself and as successor in interest to Defendant
Wachovia Bank, N.A.)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MELANIE PANZONE,

Plaintiff,

vs.

WACHOVIA BANK, N.A.; WELLS FARGO
BANK, N.A.; and DOES 1 through 10, inclusive,

Defendants.

No.: CV-10-2720-EMC

STIPULATION AND ~~PROPOSED~~ ORDER:

(1) EXTENDING TIME TO RESPOND TO COMPLAINT, AND

(2) CONTINUING CASE MANAGEMENT CONFERENCE AND RELATED DEADLINE

Whereas, Plaintiff Melanie Panzone (“Plaintiff”) filed her Complaint on June 22, 2010, but has not yet served the Complaint on Defendant Wachovia Bank, N.A. or Defendant Wells Fargo Bank, N.A. (collectively, “Defendants”); and

Whereas, Plaintiff and Defendants have reached an agreement in principle regarding settlement of this matter, and are working to finalize the documentation of their agreement; and

Whereas, Plaintiff wishes to serve her Complaint within the time limit for service provided by the rules of this Court; and

Whereas, in consideration of the stipulation set forth herein, Defendants have agreed to

1 accept service (through their counsel) of the Complaint, with service effective October 19, 2010; and

2
3 Whereas, Plaintiff and Defendants request that the Court (a) extend Defendants' time to
4 respond to the Complaint, and (b) continue the Initial Case Management Conference and related
5 deadlines in order to allow the parties to finalize the documentation of their settlement, and failing
6 that, to allow Defendants time to respond to the Complaint;

7
8 Now, therefore, IT IS HEREBY STIPULATED that an Order may be entered:

9 (1) Extending Defendants' time to respond to the Complaint through and including
10 December 1, 2010; and

11 (2) Continuing the Initial Case Management Conference from the presently-scheduled
12 date of November 10, 2010, to December 1, 2010, or as otherwise may be scheduled by the Court.
at 1:30 p.m.

13 Further, the parties will file their joint Case Management Conference Statement no later than
14 November 24, 2010. The parties agree, and request that the Court confirm, that Defendants'
15 participation in, and filing of, the joint Case Management Statement will neither constitute a
16 response to the Complaint, nor constitute any waiver or forfeiture of any defenses or claims that may
17 be raised by any Defendant at any time and in any manner, whether in a response to the Complaint
18 or otherwise. A joint CMC Statement shall be filed by November 24, 2010.

19 DATED: October 19, 2010.

THOMPSON WIGDOR & GILLY LLP

20
21 By /s/ Lawrence Pearson

Lawrence M. Pearson
Attorneys for Plaintiff
Melanie Panzone

22
23 DATED: October 19, 2010.

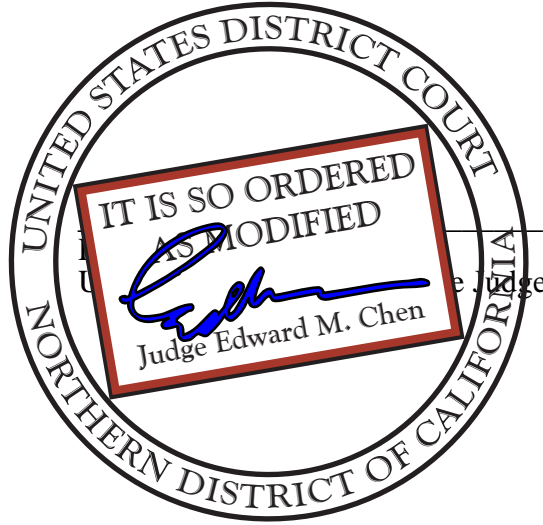
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24
25 By /s/ Lisa Carvalho

Lisa M. Carvalho
Renee Feldman
Attorneys for Defendant Wells Fargo Bank, N.A.
(for itself and as successor in interest to Defendant
Wachovia Bank, N.A.)

IT IS SO ORDERED.

DATED: October 21, 2010



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